



City of Seattle

Gregory J. Nickels, Mayor

Seattle City Light

Jorge Carrasco, Superintendent

FILE COPY

April 1, 2005

Howard Orlean
RCRA Compliance Unit, AWT-121
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
APR 06 2005
Office of Air, Waste & Toxics

FILE COPY

Dear Mr. Orlean:

Phase II Transformer PCB Investigation Work Plan, Boeing Plant 2, Seattle/Tukwila, Washington, EPA ID No. WAD 00925 6819, RCRA Docket No. 1092-01-22-3008(h)

I have received word that Anna Filutowski has taken another position and that you have become the RCRA lead for Boeing Plant 2. Congratulations and welcome to the task. I appreciate your knowledge of this site and look forward to working with you.

As you know, Seattle City Light (SCL) owned transformers at a Boeing substation in the area of the subject investigation. I am tracking the investigation for SCL and may be reached at (206) 386-4585 or laurie.geissinger@seattle.gov concerning the transformers or SCL service to Plant 2. Previously, I asked Anna to send me all EPA documents and correspondence pertaining to the transformer investigation. I would appreciate your continuing to do this, and also ask that you add me to the distribution for EPA fact sheets or other documents pertaining to Boeing Plant 2.

I recently received an EPA fact sheet that greatly concerns me. The September, 2004 "Environmental Fact Sheet" (copy enclosed) includes grossly misleading text reading "Boeing is investigating PCBs released from Seattle City Light transformers..." and "Investigating contamination from Seattle City Light transformers". While Boeing has assumed and repeatedly claimed SCL transformers released PCBs that resulted in high-level soil contamination near the substation pad, substation and transformer sampling data do not support this conclusion, and in fact support the opposite.

I respectfully request that EPA retract the fact sheet and provide a corrected version that eliminates unsupported conclusions about the role of SCL transformers in contamination found near the substation. Reports on Phase II activities should similarly refrain from statements that are not supported by the data. Any statements rendering conclusions about operations along the Duwamish coming from EPA carry great weight. Lacking a sound basis

USEPA RCRA



3013970

700 Fifth Avenue, PO Box 34023, Seattle, WA 98124-4023
Tel: (206) 684-3000, TTY: (206) 233-7241, Fax: (206) 625-3709

An equal employment opportunity, affirmative action employer. Accommodations for people with disabilities provided upon request.

Howard Orlean
U.S. Environmental Protection Agency
April 1, 2005
Page 2

for these conclusions undermines the working relationships of all parties concerned with addressing contamination near and within the Duwamish.

Following are some facts I ask that you keep in mind. This is only a brief statement on other possible sources and the 2004 substation/transformer data. If a more substantive overview of SCL equipment and operations would be helpful, or if you have other questions, please contact me.

Possible Sources

Very little has been reported during the referenced investigation about possible PCB sources with the notable exception of SCL transformers. There are many historical PCB sources in the southern portion of the Plant 2 site that have or had direct migration pathways via the stormwater drainage system to the substation area and Duwamish River outfalls. For example, prior work during the RCRA clean-up documented that Boeing had a number of PCB oil transformers in below-ground vaults at Plant 2, some of which contributed to high level PCBs in storm drains. An open gutter or ditch connected a waste oil storage area at former Building 2-91 to the substation area. In addition, drainage lines which served Boeing facilities where PCB-containing materials were likely used and stored ran under and near where the substation is now located. Additionally, aerial photos and Boeing reports indicate that the substation area was used for raw material storage and handling prior to construction of the substation.

Substation and Transformer Sampling Results

Data generated by both Boeing and SCL do not support the assertion that PCB releases from the transformers caused the hotspot adjacent to the transformer pad. Data provided by Boeing in Appendix D of the Phase II Work Plan, and SCL laboratory results of splits of these samples (sent to Anna Filutowski, with copy to you, September 14, 2004) yielded similar results. All transformer and oil wipe samples reported by SCL were below detection limits for PCBs, with a detection limit of 1 mg/kg for the oil and 2 ug/100 sq cm for the wipe samples. One concrete pad sample showed a trace amount of PCBs (less than 0.74 mg/kg). One surface material (debris scraped off the concrete) sample from the pad contained 1.04 mg/kg total PCBs. Boeing's PCBs results for their transformer oil samples, reported in Appendix D of the Phase II Work Plan, were all below detection limits. Several wipe samples showed PCBs ranging from 1.7-3.1 ug/100 sq cm. PCBs were detected in one concrete pad sample at 1.2 mg/kg, and one pad debris sample contained 4.0 mg/kg. In addition to these recent data, SCL oil and wipe sample results from 1985, 1988, 2000 and 2002 were all less than 1 mg/kg.



700 Fifth Avenue, PO Box 34023, Seattle, WA 98124-4023
Tel: (206) 684-3000, TTY: (206) 233-7241, Fax: (206) 625-3709

An equal employment opportunity, affirmative action employer. Accommodations for people with disabilities provided upon request.

Howard Orlean
U.S. Environmental Protection Agency
April 1, 2005
Page 3

I also conducted a search for historical PCBs data associated with the substation and located PCBs data for transformers located at the substation for a period between 1953 and 1957. I found sample results for transformer oil that contained 6 mg/kg PCBs. This value is the *highest* concentration found for all historic and recent sampling for the West Boeing substation and transformers. This information has been provided to Boeing.

Based on the available data, it appears that the PCB contamination in soils near the transformer pad did not come from the SCL transformers. Soil samples reported by Boeing near the transformer pad had concentrations as high as 660 mg/kg PCBs while both historical and recent PCBs samples associated with the pad had either non-detectable levels of PCBs or concentrations at or substantially less than 6 mg/kg. This difference in concentrations simply does not support Boeing's arguments that the transformers are the source of the PCBs in the soil hotspot. I would greatly appreciate it if EPA would take immediate steps to retract the fact sheet, and contact me to discuss this important matter. As always, I am committed to working with you to answer all questions about SCL equipment and operations and will keep you abreast of any new information discovered with relevance to this investigation.

Sincerely,



Laurie G. Geissinger
Senior Planning and Development Specialist

Enclosure

cc: Shelia Eckman, EPA
Rick Albright, EPA
Charlie Ordine, EPA
Kathy Veit, EPA
Cindy Schuster, EPA
Martin Baker, Seattle Public Utilities
Laura Wishik, Seattle Law Department

LG/kts



700 Fifth Avenue, PO Box 34023, Seattle, WA 98124-4023
Tel: (206) 684-3000, TTY: (206) 233-7241, Fax: (206) 625-3709

An equal employment opportunity, affirmative action employer. Accommodations for people with disabilities provided upon request.